

communities●connect●network

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Communities Connect Network (CCN) is a statewide coalition of public and private organizations working to make Washington state a leader in technology opportunities for all.

Comments Before the
DEPARTMENT OF COMMERCE NATIONAL TELECOMMUNICATIONS AND
INFORMATION ADMINISTRATION
and the
DEPARTMENT OF AGRICULTURE RURAL UTILITY SERVICE
Washington, D.C. 20230

In the Matter of
Implementation of Section 6001 of the American Recovery and Reinvestment Act of
2009
Docket No: 0907141137-91375-05
Implementation of Title I of the American Recovery and Reinvestment Act of 2009

Introduction:

The Communities Connect Network (CCN) is a coalition across Washington State of public, private and non-profit entities working to ensure digital inclusion for all residents. We helped develop the Community Technology Opportunity grant program in Washington State, the definition of digital inclusion in state law, and CCN has partnered to conduct research and provide capacity building services for broadband adoption and public access computing projects in Washington State. Some of our constituents applied in the first round. We are pleased to have this opportunity to submit comments. CCN has these recommendations for the next application round:

- 1) Require that infrastructure projects in unserved and underserved areas also address demand side barriers to broadband adoption.
- 2) Increase the funding for public access computing and broadband adoption programs to ensure that vulnerable populations are able to participate fully in a broadband America.
- 3) Support best practices capacity building networks.
- 4) Reinforce the eligibility of libraries, community technology center and low-income housing programs serving vulnerable populations for the public access computing funds and broadband adoption funds.
- 5) Clarify the definition of “community anchor institutions”

1. Require infrastructure projects to address demand side barriers

Infrastructure projects should be required to provide components that address the demand side barriers of broadband adoption: affordability, skills training, and exposure to broadband through public computing centers. Points should be given to projects which address affordability for vulnerable population or small anchor institutions and for

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The Communities Connect Network is a project of the Puget Sound Center for Teaching,
Learning and Technology.

those which leverage existing expertise in public access computing and broadband adoption by partnering with community technology programs or libraries.

However public access computing and broadband adoption programs should not be required nor points subtracted for not providing additional backbone infrastructure, as these programs are more likely to be applying expertise and focusing resources on the education and awareness efforts that increase broadband technology adoption among vulnerable populations.

Support continued use of vulnerable populations for eligibility and prioritizing of public access computing and broadband adoption programs. Data which could support this

The current application process does not encourage infrastructure projects to address demand side issues.

2. Increase the Funding for Public Access Computing and Broadband Adoption Programs

In response to the RFI section II. A. 3 concerning targeted populations, we believe that additional investment in Public Computer Centers and Sustainable Broadband Adoption projects is warranted to ensure greater awareness of the benefits of and the skills training necessary to fully utilize broadband for vital online legal, public safety, education and health services. Broadband adoption studies, such as one recently released by the City of Seattle,¹ continue to show significant issues of affordability and lower broadband adoption for specific populations, correlated to income, education, employment, disability and ethnicity. Many of these residents require significant use of the justice system, public safety services and public health systems and will be at a greater disadvantage without affordable broadband services and training as intended by ARRA.

\$250 million was originally set as the minimum amount for sustainable adoption funds and \$200 million for public access computing. CCN believes that the level of public access computing and adoption funding should be much greater than that, as well-spent public access and adoption funds will lead to the quickest increase in broadband subscription and target low-income populations that are most at risk. The Communities Connect Network recommends that funds for these two programs should be doubled.

3. Support networks which ensure use of best practices and sustainable capacity building

There should be a category and funds awarded or at minimal points given to “broadband adoption support networks” which group multiple public access computing and broadband adoption providers together to ensure use of best practices, staff training, common and quality evaluation metrics, cost efficiencies and sustainability capacity building.

¹ City of Seattle, 2009 Information Technology Access and Adoption Report, published at www.seattle.gov/tech/indicators

4. Reinforce eligibility for public access computing and adoption programs

Public access computing programs in libraries and community technology centers (CTC's) target vulnerable populations in all areas of the state. The applications and eligibility should be clarified to acknowledge and allow that these centers will target specific vulnerable populations, even if they are located in wealthier areas. Numerous studies have found and we believe the NTIA recognizes lower adoption rates by those who may be low-income, low-educated, disabled or elderly. Rather than require state level data or other data that is broader than the target population, the primary factor should be who these programs are targeting. Those in affordable housing are already predetermined to be low income and should be eligible and supported. Libraries and community technology centers are established to serve vulnerable populations. High burdens of documentation on what are often smaller organizations could impede rather than promote participation by these organizations with expertise in reaching technology needy populations.

5. Clarify the definition of “community anchor institutions”

The Recovery Act does not define the term “community anchor institutions.” This term was defined in the July 9, 2009 NOFA for the BTOP and BIP initiatives. The definition set forth in the July 9, 2009 NOFA might be read to exclude key community-based technology access and learning centers and law and justice system-related entities that provide outreach, access, equipment, and support services to facilitate greater use of broadband service by low-income, unemployed, aged, and otherwise vulnerable populations. The Community Technology Centers have been previously recognized by the U.S. Department of Education’s community technology grant program.² We suggest that the definition be amended to read:

Community anchor institutions means schools, libraries, medical and healthcare providers, community technology centers, law, justice and public safety entities, community colleges and other institutions of higher education, and other community support organizations and agencies that provide outreach, access, equipment and support services to facilitate greater use of broadband service by vulnerable populations, including low-income, unemployed, and the aged.

Respectfully submitted for the Communities Connect Network

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Executive Director

² <http://www.ed.gov/programs/comtechcenters/index.html>